

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
JOANN INC., <i>et al.</i> , ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket Nos. 427, 553 and 675

**AMENDED DECLARATION
OF DISINTERESTEDNESS
OF JACKSON LEWIS P.C. PURSUANT TO THE ORDER
AUTHORIZING THE DEBTORS TO RETAIN AND COMPENSATE
PROFESSIONALS UTILIZED IN THE ORDINARY COURSE OF BUSINESS**

I, Corey Donovan Tracey, declare under penalty of perjury:

1. I am a Principal of Jackson Lewis P.C., located at 6100 Oak Tree Blvd. Suite 400 Cleveland, OH 44131 (the “Firm”).

2. JOANN Inc. and certain of its affiliates, as debtors and debtors in possession (collectively, the “Debtors”), have requested that the Firm provide employment advice and counsel (including but not limited to compliant reduction of its workforce in light of bankruptcy proceedings), investigative, and litigation legal services to the Debtors, and the Firm has consented to provide such services.

3. The Firm may have performed services in the past, may currently perform services, and may perform services in the future in matters unrelated to these chapter 11 cases for persons that are parties in interest in the Debtors’ chapter 11 cases. The Firm does not, however, and shall

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

not, perform services for any such person relating to these chapter 11 cases, or have any relationship with any such person, their attorneys, or their accountants that would be adverse to the Debtors or their estates.

4. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be employed by the Debtors, claimants, and parties in interest in these chapter 11 cases.

5. Neither I nor any principal, partner, director, or officer of, or professional employed by, the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principal and regular employees of the Firm.

6. Neither I nor any principal, partner, director, or officer of, or professional employed by, the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates with respect to the matter(s) upon which the Firm is to be employed.

7. The Debtors owe the Firm \$21,947.89 for prepetition services, the payment of which is subject to the limitations contained in title 11 of the United States Code, 11 U.S.C. §§ 101–1532. The Firm has waived, or will waive, any prepetition claims against the Debtors' estates.

8. As of the Petition Date, which was the date on which the Debtors commenced these chapter 11 cases, the Firm was retained to provide professional services to the Debtors. The Firm was retained on November 14, 2013.

9. As of the Petition Date, which was the date on which the Debtors commenced these chapter 11 cases, the Firm was not party to an agreement for indemnification with certain of the Debtors.

10. Pursuant to Federal Rule of Bankruptcy Procedure 2014(a), I obtained a list of interested parties (the “Interested Parties List”) from counsel to the Debtors which includes the Debtors, their creditors, other parties in interest, and certain professionals employed in the Chapter 11 Cases (the “Interested Parties”) and undertook a search for any connections between the Firm and the Interested Parties. The Firm’s review of such Interested Parties identified the connections listed in the attached **Exhibit A**, including current and prior representations, for which Jackson Lewis has performed legal work related specifically to employment law issues.

11. The Firm did receive a prepetition retainer in the amount of \$65,000.00 which was exhausted against post-petition legal services. The balance of the prepetition retainer is currently \$0.00.

12. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Date: April 29, 2025


COREY DONOVAN TRACEY

Exhibit A: Jackson Lewis Connections on “Interested Parties List”

ABB, Inc.
ACADIA STRATEGIC OPPORTUNITY FUND V
Acadia Trust Realty/Acadia Merrillville
ACE AMERICAN INSURANCE CO
ACME UNITED CORPORATION
ADP, Inc.
AIG SPECIALTY INSURANCE COMPANY
ALLIANZ GLOBAL RISK US INSURANCE COMPANY
ALLIED WORLD
Amazon
American Electric Power
AMERICAN EXPRESS
AMERICAN GUARANTEE AND LIABILITY COMPANY
Arch Insurance Co.
AXA XL
AXIS INSURANCE COMPANY
B. Riley Financial, Inc.
Bank of America
Bank of America, N.A.
BERKLEY INSURANCE COMPANY
BIG Y FOODS
BLUE YONDER INC
Bowman and Brooke LLP
BRINK'S INCORPORATED
Brookdale Senior Living
Brooklyn Public Library
Brother
Brother International Corp.
Brother International Corporation
C-A-L Stores
CBL & Associates
CHUBB
Cincinnati & Hamilton County Public Library
City of Vero Beach
Cleveland Public Library
Con Edison
Consolidated Edison Company of New York, Inc.
CONTINENTAL CASUALTY COMPANY (CNA)
COOKIES UNITED LLC
CORDIAL EXPERIENCE INC
County of Tulare
CRAYOLA LLC
CRESCENT ELECTRIC SUPPLY CO

CVS- CAREMARK
De Lage Landen Financial Services
Deloitte & Touche LLP
Deloitte LLP
DLA Piper
Duke Energy Progress
Dynergy Energy Services LLC
EMMES
EMPLOYBRIDGE HOLDING CO
ENDURANCE
Entergy
Ernst & Young LLP
EVEREST INDEMNITY INSURANCE COMPANY
FACILITYSOURCE LLC
Fairfield Processing
FAIRFIELD PROCESSING
Federal Express Corporation
FEDERAL REALTY OP LP/FEDERAL REALTY INVESTMENT TRUST
FIREMANS FUND INS CO
Firemans Fund Ins. Co
FMR LLC
FMR LLC (Fidelity)
Giant Eagle
Gibson Dunn & Crutcher
Gildan Activewear Inc.
GLOBALTRANZ ENTERPRISES LLC
GOOGLE INC
GRAND & BENEDICTS INC
Great American Holdings LLC
Greenville County Library System
HCC SPECIALTY INSURANCE CO
Hobby Lobby
Huntington National Bank
Hyundai GLOVIS
IBM CORP
IG DESIGN GROUP AMERICAS
INFOSYS LTD
INTERNATIONAL PAPER
Jackson Lewis P.C.
JANOME AMERICA INC.
JB HUNT TRANSPORT INC
Jo-Ann Stores
Jones Day
Jones Lang Lasalle Americas Inc.
JOSHEN PAPER & PACKAGING
JP Morgan Chase Bank

Kelley Drye & Warren LLP
Key Bank
KEYSTONE FREIGHT CORP
KIMCO REALTY CORPORATION
Kirkland & Ellis
Lancaster Development
LARSON & JUHL
LEGO SYSTEMS INC
LIBERTY INSURANCE CORPORATION
LIBERTY MUTUAL
LIBERTY MUTUAL FIRE INSURANCE CO.
Liberty Mutual Insurance Co.
Lion Brand Yarn
LION BRAND YARN CO
Lowenstein Sandler
Madison Place is client affiliated in an open matter for JL Client Tri 3 Inc.
Maersk Warehousing & Distribution Services USA LLC/ Maersk Line, Limited/ Maersk Agency USA Inc.
MCD-RC-CA El Cerrito is a client through Regency Centers
Meijer Inc.
META PLATFORMS INC
Metropolitan Life Insurance Company
MG Properties
Monroe Crossing Owner
Montgomery Realty
Morgan, Lewis & Bockius
Nassau Library System
NATIONAL UNION FIRE INSURANCE COMPANY(AIG)
NAVIGATORS INSURANCE
NNN REIT
NorberTrust
Nordstrom
Northern Lights Smoke Shop/ Northern Lights Federal Credit Union/ Northern Lights College
OFF THE WALL CO LLC
OOCL USA INC
ORACLE AMERICA INC
ORCHARD YARN & THREAD CO INC
Orchard Yarn & Thread Co.
Orchard Yarn & Thread Company
Pacific Gas & Electric Company
Pacific Gas and Electric Company
Pacific Power
PECO Energy Company
People's Capital & Leasing
Pepsi-Cola Bottling Company of Atmore, Inc/ Pepsico, Inc.
PINTEREST, INC.

PMC Associates might be related to PMC Property Group
PNC Bank
PNS Stores
Progress Energy
PUBLICIS SAPIENT
Queens Borough Public Library
Real Sub
Realty Income
Regency Centers LP
Regency Centers/US Retail Partners
Regency Central
Regions Bank
Roland Berger LP
S2G-OHIO INC
Salesforce, Inc.
Santee Cooper
Sawgrass Country Club, Inc.
SCHYLLING INC
SECURITAS TECHNOLOGY CORP
SEDGWICK CLAIMS MGMT SERV INC
Selig Enterprises
Seven Corners Center is affiliated with JLCClient BF Saul & Co
Shoppes at River Crossing is affiliated with JLCClient Brookfield Prop. REIT
Simon Property Group, Inc.
Sno-Isle Libraries
SOMPO
Southern California Edison
Springs Window Fashions
Standard 5-10-25 Cent Stores
Sumter Electric Cooperative, Inc.
SureFire
SWISS RE
TD Bank, N.A.
The Baltimore Gas & Electric Co.
THE CONTINENTAL INSURANCE COMPANY (CNA)
The Empire District Electric Company
TIAA Cref Investment Services
TIMELESS TREASURES FABRIC
TOLL GLOBAL FORWARDING (USA) INC
Topocean Consolidation Service, Inc.
TRANSFORM HOLDCO LLC
TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA
TwinPeaks Ultimate Holdings LLC
U.S. Bank National Association
UNITED AIRLINES INC

Unitil
Valley Forge Fabrics
VELCRO USA INC
VIBES MEDIA LLC
VISTAR CORPORATION
Walmart
Wells Fargo
WELLS FARGO BANK
WESTFIELD
Williams Sonoma, Inc.
Wright Family Enterprises
XPO LOGISTICS FREIGHT INC
ZEBRA PEN CORPORATION
Zulily
ZURICH AMERICAN INSURANCE COMPANY
REDACTED
REDACTED
REDACTED
REDACTED
REDACTED